UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI-DADE DIVISION

ZAGG INC,	Case No.: 1:23-cv-20304-ALTMAN/REII
Plaintiff,	
v.	
MENACHEM MENDEL ICHILEVICI; TX TRADING INC.; DVG TRADE LLC; and	
Defendants.	<u>_/</u>
DVG TRADE LLC,	
Counterclaim-Plaintiff,	
v.	
ZAGG INC., SCREENYA, LLC, MERRIL LONGMORE, and BRENDAN BUCKNER,	
Counterclaim-Defendants.	_/

DVG TRADE LLC'S MOTION TO SEAL UNREDACTED VERSION OF DVG'S OBJECTIONS TO THE COURT'S FEBRUARY 28, 2025 DISCOVERY ORDER [288]

Pursuant to Local Rule 5.4, Defendant/Counterclaim-Plaintiff DVG Trade LLC ("DVG" or "Defendant") respectfully submits this motion to seal the unredacted version of its Rule 72(a) Objections to the Court's February 28, 2025 Discovery Order (ECF No. 288). DVG seeks this relief due to the nature and contents of the redacted portions, which include information and testimony that the Court has already placed under seal in connection with Zagg's Motion for Spoliation, to which the February 28, 2025 Discovery Order relates. Specifically, the portions that

DVG seeks to maintain under seal are quotations from the Sealed December 2, 2024 Evidentiary Hearing; from a document that was filed under seal in connection with Zagg's underlying Motion for Spoliation (ECF No. 240); and from an exhibit that was filed under seal in connection with DVG's Opposition to that Motion (ECF No. 251-2).

WHEREFORE DVG respectfully requests that the Court enter an order (1) placing under seal the unredacted version of DVG's Rule 72(a) Objections to the Court's February 28, 2025 Discovery Order (ECF No. 288); and (2) granting such further relief as it deems just and proper.

March 28, 2025

Respectfully submitted,

By: <u>/s/ Geoffrey M. Cahen</u>

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been

electronically filed, this 28th day of March, 2025, to:

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By: /s/ Geoffrey M. Cahen